

EXHIBIT F

Lockwood, M.D., John M.

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Washington, DC

December 6, 2007

Page 1

1 UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF MASSACHUSETTS

3 - - - - -

4 IN RE: PHARMACEUTICAL) MDL NO. 1456
5 INDUSTRY AVERAGE WHOLESALE) CIVIL ACTION
6 PRICE LITIGATION) 01-CV-12257-PBS
7 THIS DOCUMENT RELATES TO)
8 U.S. ex rel. Ven-a-Care of) Judge Patti B. Saris
9 the Florida Keys, Inc.)
10 v.) Chief Magistrate
11 Abbott Laboratories, Inc.,) Judge Marianne B.
12 No. 06-CV-11337-PBS) Bowler

13 - - - - -

14 (caption continues on following pages)

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17 Videotaped deposition of JOHN M. LOCKWOOD, M.D.

18 Volume I

19

20 Washington, D.C.

21 Thursday, December 6, 2007

22 9:00 a.m.

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1 IN THE DISTRICT COURT OF TRAVIS COUNTY, TEXAS

2 201st JUDICIAL DISTRICT

3 - - - - -

4 THE STATE OF TEXAS,)

5 ex rel. VEN-A-CARE OF THE)

6 FLORIDA KEYS, INC.,)

7 Plaintiffs,) Cause No. GV401286

8 vs.)

9 ABBOTT LABORATORIES INC., et)

10 al.,)

11 Defendants.)

12 - - - - -

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14 Videotaped deposition of JOHN M. LOCKWOOD,
 15 M.D., held at the law offices of Jones Day, 51
 16 Louisiana Avenue, N.W., Washington, D.C. 20001-2113,
 17 the proceedings being recorded stenographically by
 18 Jonathan Wonnell, a Registered Professional Court
 19 Reporter and Notary Public of the District of
 20 Columbia, and transcribed under his direction.

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1 A P P E A R A N C E S O F C O U N S E L

2

3 On behalf of the United States of America:

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22 (Cont'd)

1 A P P E A R A N C E S (Cont'd)

2

3 On behalf of Ven-A-Care of the Florida
4 Keys, Inc.:

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13 On behalf of Abbott Laboratories, Inc.:

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1 A P P E A R A N C E S (Cont'd)

2

3 On behalf of Dey, Inc. and Dey, L.P.

4 and Mylan:

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13 Boehringer Ingelheim:

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1 A P P E A R A N C E S (Cont'd)

2

3 ALSO PRESENT:

4 T. MARK JONES, Ven-A-Care

5 LUIS COBO, Ven-A-Care

6 EMILY WATSON, legal assistant

7 CONWAY BARKER, videographer

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1 BY MR. COOK:

2 Q. How much money did you receive
3 following the BMS settlement?

4 A. I would think somewhere around the same
5 number. I don't know exactly. Once again, I'm
6 not sure what the pre and post tax dollars
7 situation would be. But somewhere around there.

8 Q. How much money in total have you
9 received from Ven-A-Care other than the post
10 settlement payments that we've discussed already?

11 MR. BREEN: Objection to form.

12 A. I would say that would be the payments
13 that I've received other than whatever salary,
14 bonuses that are all part of that.

15 Q. Do you have a number in mind personally
16 of how much money total you've received as a
17 result of your relationship with Ven-A-Care since
18 1995?

19 A. I don't think I've ever sat down and
20 figured out what that number is. But if you have
21 been making a little I guess you could estimate
22 from what I've told you. I don't know exactly.

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1 Q. Would close to \$10 million sound about
2 right?

3 A. I would think in probably pretax
4 dollars, somewhere around there. Yeah. I would
5 think somewhere around there in pretax dollars.
6 Maybe a little more in pretax dollars. We've
7 been very successful.

8 Q. At what have you been very successful?

9 A. At recovering monies for the Medicare
10 and Medicaid programs.

11 Q. You testified that you spend
12 approximately eight hours a week at Ven-A-Care?

13 MR. BREEN: Objection to form.

14 A. I would say I spent more like eight
15 hours a day at Ven-A-Care as opposed to eight
16 hours a week.

17 Q. I misspoke. I apologize. That you
18 were spending approximately eight hours a day
19 plus another couple at home which to my
20 calculation comes out to about a 40 hour work
21 week. Does that sound about right?

22 A. I probably end up working a lot more

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1 deposition was adjourned.)

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JOHN M. LOCKWOOD

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10 Subscribed and sworn to and before me

11 this _____ day of _____, 20____.

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15 _____
Notary Public

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